

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

LLOYD C. HILL, JR., a single man,

Plaintiff,

vs.

KING COUNTY, a Washington municipal corporation; CHARLES MOREY, and the marital community comprised of CHARLES MOREY and DOE MOREY; MICHAEL CHASE and the marital community comprised of MICHAEL CHASE and DOE CHASE; RICHARD ALMANZA, and the marital community comprised of RICHARD ALMANZA and DOE ALMANZA; DENNIS FOLK and the marital community comprised of DENNIS FOLK and DOE FOLK; MARCIAL J. WILLIAMSON and the marital community comprised of MARCIAL J. WILLIAMSON and DOE WILLIAMSON; and KENDRA JEFFERSON and the marital community comprised of KENDRA JEFFERSON and DOE JEFFERSON,

Defendants.

CASE NO. 2:23-cv-00771-RSM

STIPULATED MOTION FOR ORDER
CONTINUING DEADLINE FOR
FILING MOTIONS RELATED TO
DISCOVERY

I. RELIEF REQUESTED

Plaintiffs and Defendants hereby submit this stipulated motion for entry of an order continuing the deadline for parties to file motions related to discovery for two weeks, from June

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1 16, 2025 to June 30, 2025. In support of this motion, the parties jointly submit the following to
2 the Court:

3 1. On November 19, 2024, the Court entered its Order on the parties' stipulated
4 motion, establishing June 16, 2025 as the deadline for the parties to file motions related to
5 discovery. Dkt. #32.

6 2. In this case, Plaintiff seeks recovery of money damages for an alleged incident
7 that occurred at the King County Jail on December 24, 2020, which Plaintiff alleges resulted in
8 serious personal injuries. Several King County corrections officers who were involved in the
9 alleged incident are defendants in this action.

10 3. The parties have diligently pursued and participated in discovery. Both sides have
11 propounded extensive written discovery and have produced voluminous documents in response
12 to requests for production of documents. Numerous depositions have been taken. Written reports
13 from both sides' experts have been timely exchanged. However, there remain a few outstanding
14 written discovery requests propounded by Plaintiff to Defendants. The parties have conferred
15 about these remaining discovery issues and are attempting to resolve them cooperatively.

16 4. Due to a shift in case assignments in the office of Defendants' counsel, new lead
17 counsel for Defendants associated as attorney for Defendants on May 28, 2025, just three weeks
18 ago. *See* Dkt. #38. Defendants' new attorney has diligently been reviewing the facts and case
19 issues.

20 5. Without a short extension of the deadline for filing motions related to discovery,
21 the parties will be required to devote important and finite resources to preparing a motion to
22 compel discovery and to respond to the motion rather than continuing their efforts to resolve the
23 the issues cooperatively. The parties submit that they anticipate that if the Court grants a two-
24

1 week extension for the parties to file motions related to discovery, the parties will be able to
2 resolve all outstanding discovery issues without requiring motion practice before the Court.

3 6. Wherefore, the parties jointly move and stipulate that the deadline for the parties
4 to file motions related to discovery be extended from June 16, 2025 to June 30, 2025.

5 SO STIPULATED on June 16, 2025.

6 ***Attorneys for Plaintiff:***

7 BERRY & BECKETT, PLLP

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9 /s/ Guy Beckett

/s/ Edward H. Moore

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13 ***Attorneys for Defendants:***

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15 King County Prosecuting Attorney

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II. ORDER

The Court having considered the foregoing stipulated motion, and finding that good cause has been shown for the requested relief, now therefore, FINDS and ORDERS that the deadline for the parties to file motions related to discovery is extended from June 16, 2025, to June 30, 2025.

DONE THIS 17th day of June, 2025.



RICARDO S. MARTINEZ
UNITED STATES DISTRICT JUDGE